

FILED

MAY 10 2016

CLERK, U.S. DISTRICT COURT
NORFOLK, VA

I, James A. Faulkner, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

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1. I am employed by the United States Department of Justice as a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and have been so employed since 2012. I am assigned to the Norfolk Field Office, where my primary duties include, but are not limited to, the investigation of human trafficking, kidnappings, bank robberies, fugitives, violent incident crimes, commercial robbery, homicides, gang and narcotics organizations, organized criminal enterprises, and covert surveillance. As part of my duties as an FBI agent, I investigate criminal violations relating to human trafficking, in violation of Title 18, United States Code, Sections 1591 and 1594. I have received specialized training in federal criminal investigations, including those involving the prostitution of minors and human trafficking.

2. The information contained in this Affidavit is based on my personal knowledge, the review of documents, and observations made by me during the course of this investigation, as well as, information conveyed to me by other individuals, including information obtained from other law enforcement agencies.

3. Because this Affidavit is submitted for the limited purpose of establishing probable cause in support of the application for an arrest warrant, this Affidavit does not set forth each and every fact learned by me or observed by me during the course of this investigation.

4. This Affidavit includes only the facts I believe are necessary to establish probable cause to believe that TRAVIS C. BROWN and DAKOTA SULKER committed a violation of 18 U.S.C. § 1594(c), a Conspiracy to Engage in Sex Trafficking of a Child.

LEGAL AUTHORITY

5. Title 18, United States Code, Section 1594(c) prohibits a person from conspiring with another to violate Section 1591. Title 18, United States Code, Section 1591(a), in pertinent part, makes it a criminal offense to knowingly (1) in or affecting interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States, recruits, entices, harbors, transports, provides, obtains, or maintains by any means a person; or (2) benefit, financially or by receiving anything of value, from participation in a venture which has engaged in an act described in violation of paragraph (1), knowing, or in reckless disregard of the fact, that means of force, threats of force, fraud, coercion or any combination of such means will be used to cause the person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act.

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BACKGROUND OF THE INVESTIGATION AND
FACTS SUPPORTING PROBABLE CAUSE

A. Case Inception and Recovery of Jane Doe

6. On March 19, 2016, Detectives with the Virginia Beach Police Department (VBPD) responded to a call for assistance from Sentara Norfolk General Hospital concerning possible prostitution activity involving a minor victim occurring within Virginia Beach, Virginia. Upon arriving at the hospital, the Detectives met with an 18 year old identified as C.A. who was being treated for sexual trauma and rape. C.A. reported to detectives that she was being sex trafficked by a black male named TRAVIS C. BROWN. C.A. reported that BROWN had driven her and other girls to Virginia Beach from South Carolina and forced them to prostitute. C.A. further stated that she had escaped from BROWN on the afternoon of Friday, March 18, 2016, when she, BROWN and others were checking out of a hotel located on Burton Station Road in Virginia Beach, Virginia.

7. Following this conversation, VBPD responded to the hotel on Burton Station Road and verified that TRAVIS BROWN was listed on the guest registry for the hotel for the period from March 14 to 18, 2016. BROWN had listed a black Ford Mustang with a South Carolina registration on the hotel's guest registry. VBPD located a car matching this description in the parking lot of a neighboring hotel – one located on Northampton Boulevard in Virginia Beach, Virginia – and, after surveilling the vehicle, observed BROWN operating the Ford Mustang while driving to and from the hotel.

8. Simultaneously with their surveillance efforts, on March 19, 2016, VBPD located several prostitution advertisements on the website www backpage com – an Internet website known to advertise local prostitution services – linked by cellular telephone number to females prostituting for BROWN. VBPD Detective then conducted an undercover operation during which time they identified Jane Doe, a 16 year old female, as a minor victim of sex trafficking. VBPD recovered Jane Doe from the hotel located on Northampton Boulevard and placed her in an emergency shelter.

B. Jane Doe

9. VBPD and FBI interviewed Jane Doe, who stated that in early March 2016, she had had a fight with her mother and left home. Jane Doe reported that she had been staying with a friend of a friend named "Gs" at a hotel in Newport News from approximately March 10 until March 16, 2016. At the end of that week, "Gs" asked Jane Doe if she wanted to make money. Jane Doe said yes, but stated to VBPD that "Gs" did not explain what she would need to do to make money. Shortly thereafter, Jane Doe used "Gs" cell phone to place a call and observed a text message from "Gs" to a contact named "Tweezy" that stated "Are y'all gonna come get the girl" or words to that effect.

10. Jane Doe further stated that on Wednesday March 16, 2016, a black male introduced to her as "Tweezy," a white female introduced to her as "Candy," and an unidentified black male came to the hotel where she was staying with "Gs." Jane Doe stated that "Tweezy"

and "Candy" asked her (Jane Doe) how old she was. When Jane Doe responded that she was 16 years old, "Candy" stated to "Tweezy" that "we can use her," or words to that effect. Shortly thereafter, Jane Doe traveled by car with "Tweezy," "Candy," and the unidentified black male to the aforementioned hotel on Burton Station Road in Virginia Beach, Virginia. Upon arrival, the group went to a hotel room where they met with "Tweezy's" brother, TRAVIS C. BROWN (a/k/a "Savo"), DAKOTA SULKER, SULKER's ten month old child, and the 18 year old female identified as C.A. in paragraph 6 above.

11. Jane Doe further stated that, shortly after arriving in the hotel room, SULKER asked Jane Doe how old she was. Jane Doe responded she was 16 years old. BROWN, C.A., "Tweezy," "Candy," and the unidentified black male were all present during this conversation between SULKER and Jane Doe. During the afternoon and evening of March 16, 2016, the group stayed at the hotel and had a party during which Jane Doe was provided alcohol, marijuana, and the drug "molly." While the party was ongoing, Jane Doe observed SULKER and C.A. repeatedly leave the hotel room in which the group was staying for short time periods, then return to the hotel room with cash. Jane Doe further stated that on the night of March 16, 2016, BROWN drove her and "Tweezy," in his black Ford Mustang to a nearby hotel and dropped them off. Jane Doe spent the night with "Tweezy" in the nearby hotel, during which time he attempted to have sex with her. When Jane Doe refused his advances, "Tweezy" pulled Jane Doe by the hair and threw a lamp at her.

12. Jane Doe stated that on the morning of March 17, 2016, BROWN picked her up from the room where she was staying with "Tweezy" and brought her back to the hotel on Burton Station Road. C.A. and SULKER were present and, as with the night before, the group drank alcohol and used marijuana, and Jane Doe observed SULKER and C.A. leave the room for short periods of time, then return with cash. BROWN and SULKER directed Jane Doe to watch SULKER's infant child when SULKER left the room. At some point during the evening of March 17, 2016, BROWN attempted to have sex with Jane Doe. When Jane Doe refused, BROWN told her that he owned her, and that she had to have sex with him. When Jane Doe continued to refuse, BROWN forced her to watch him and SULKER have sex.

13. Jane Doe further stated that on the morning of March 18, 2016, C.A. ran away from BROWN as the group was checking out of the hotel. Jane Doe stated that BROWN drove her, SULKER, and SULKER's child around looking without success for C.A., then drove the group to a retail clothing store where he purchased lingerie for Jane Doe. BROWN then drove the group to a hotel located on Northampton Boulevard in Virginia Beach, Virginia, and BROWN rented two rooms. Jane Doe stated that BROWN and SULKER then told her to dress in the lingerie, and took pictures of her on a cell phone. Specifically, Jane Doe stated that BROWN and SULKER directed her on how to pose for the pictures and draped a door in the hotel room with a white cover in front of which she was to pose.

14. Later that day, SULKER directed Jane Doe to observe her (SULKER) take a prostitution appointment. At the conclusion of the appointment, SULKER provided the money she had earned to BROWN. Jane Doe then started prostituting for BROWN and SULKER. Jane Doe stated that SULKER posted online prostitution advertisements on the Internet, which advertisements bore the photographs of Jane Doe that SULKER and BROWN had taken that

day. SULKER made clear to Jane Doe that she was expected to have sex with customers during these appointments. SULKER arranged at least one prostitution appointment for Jane Doe and taught Jane Doe how to arrange her own appointments. SULKER and BROWN provided condoms for Jane Doe's use, set the prices Jane Doe was to charge the customer, and stayed in contact with Jane Doe by cell phone call or text message at the beginning and end of each appointment. At the conclusion of each appointment, Jane Doe would provide the money she had earned to BROWN. In total, Jane Doe performed approximately three prostitution appointments for BROWN and SULKER before coming into contact with VBPD detectives on March 19, 2016.

15. Jane Doe stated that on multiple occasions between March 16 and March 19, 2016, she observed BROWN with a handgun. Jane Doe further stated that, when she told BROWN she did not want to engage in prostitution BROWN threatened her and told her she did not have a choice because he needed to pay for the hotel rooms.

C. Interview of Travis Brown

16. BROWN was interviewed and, after being advised of his *Miranda* rights, stated he knew Jane Doe was prostituting and admitted he provided Jane Doe with a hotel room to conduct prostitution in, and paid for hotel rooms from the proceeds of prostitution. BROWN further admitted that he took pictures of Jane Doe for her prostitution postings. BROWN stated that SULKER provided Jane Doe with condoms and that Jane Doe took approximately three appointments during the time they were together.

D. Interview of Dakota Sulker

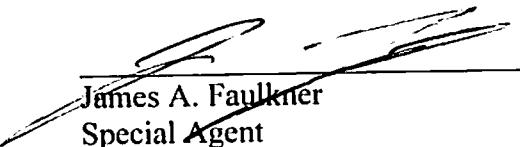
17. SULKER was interviewed and, after being advised of her *Miranda* rights, stated she knew Jane Doe was prostituting. SULKER stated that she had been told that Jane Doe was 16 years old. SULKER admitted to doing one prostitution appointment with Jane Doe, and stated that she (SULKER) and BROWN both took pictures of Jane Doe for use in prostitution advertisements.

E. Additional Information

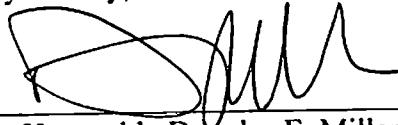
18. Further investigation uncovered several corroborating facts. For example, at both hotels where Jane Doe said she had been with BROWN and SULKER, two rooms were registered in BROWN's name on the days Jane Doe advised the group was staying there. Additionally, law enforcement obtained dozens of advertisements from www.backpage.com during the timeframe described herein, including photographs of C.A. and Jane Doe, and other persons identified and associated with the investigation. Many of these postings – including the postings of Jane Doe – were affiliated with SULKER's email address. Finally, when BROWN was taken into custody on March 19, 2016, he gave consent to search the black Ford Mustang and told VBPD that they would find a firearm in the center console of the car. A search of the vehicle recovered a Smith and Wesson .380 caliber handgun and associated ammunition was recovered from the vehicle's center console.

CONCLUSION

19. Based on the foregoing facts, training, and experience, as well as your affiant's debriefings with victim witnesses and law enforcement witnesses, your affiant believes there is sufficient probable cause to charge that from on or about March 16, 2016, to on or about March 19, 2016, TRAVIS C. BROWN and DAKOTA SULKER, in and affecting interstate and foreign commerce, did combine, conspire, confederate, and agree to knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means Jane Doe, a person who had not attained the age of 18 years, and benefitted, financially and by receiving anything of value, from participation in a venture which has engaged in such acts, knowing and in reckless disregard of the fact that Jane Doe had not attained the age of 18 years, and knowing and in reckless disregard of the fact Jane Doe would be caused to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1594(c).


James A. Faulkner
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me, this 10th day of May, 2016.


The Honorable Douglas E. Miller
UNITED STATES MAGISTRATE JUDGE